

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DESIREE PURVENAS-HAYES, Plaintiff, v. SALTZ MONGELUZZI & BENDESKY P.C. and ROBERT J. MONGELUZZI, Defendants.	Case No.: 2:22-CV-02277
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DECLARATION OF BENJAMIN K. JACOBS

I, Benjamin K. Jacobs, declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following facts are true and correct:

1. I am a Partner at Morgan, Lewis & Bockius LLP. I represent Saltz Mongeluzzi & Bendesky P.C. in this lawsuit.
2. Attached hereto as Exhibit A is a true and correct copy of an email chain between Plaintiff's counsel and my co-counsel.
3. Attached hereto as Exhibit B is an article published about this case by the *Legal Intelligencer*.
4. On July 27, 2022, SMB served on Plaintiff its First Set of Requests for Production and Interrogatories Directed to Plaintiff. Attached hereto as Exhibits C and D, respectively, are true and correct copies of those Discovery Requests and Interrogatories.
5. Attached hereto as Exhibit E is a true and correct copy of an email chain between Plaintiff's counsel and me.
6. Attached hereto as Exhibit F is a true and correct copy of an email chain between

Plaintiff's counsel and me.

7. As of September 9, 2022, SMB had not received responses or objections to its First Set of Interrogatories and Requests for Production Directed to Plaintiff.

8. Attached hereto as Exhibit G is a true and correct copy of an email chain between Plaintiff's counsel and me.

9. Shortly before the close of business on September 16, 2022, Plaintiff served on SMB her responses and objections to SMB's First Set of Requests for Production and Interrogatories Directed to Plaintiff. Attached hereto as Exhibits H and I, respectively, are true and correct copies of Plaintiff's responses and objections to those Discovery Requests and Interrogatories.

10. Attached hereto as Exhibit J is a true and correct copy of a September 29, 2022 letter correspondence between my co-counsel and Plaintiff's counsel.

11. As of October 5, 2022, SMB had not received a response to the September 29, 2022 letter correspondence.

12. Attached hereto as Exhibit K is a true and correct copy of an email chain between Plaintiff's counsel and me.

13. As of October 17, 2022, SMB had not received a response to the September 29, 2022 letter correspondence.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

October 17, 2022

/s/ Benjamin K. Jacobs
Benjamin K. Jacobs